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September 9, 2024

VIA ECF

Magistrate Judge Lois Bloom
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Status Report on Settlement Approval.

Galeas v. Houslanger & Associates, PLLC, et al., No. 1:19-cv-4270-PKC-LB

Dear Judge Bloom:

The Plaintiff Carlos Villalba, Administrator of the Estate of Ramon Galeas, has filed (through his probate counsel Judah Schwartz) a Lift Restrictions Petition which is pending in the Queens County Surrogate's Court. Given the straightforward nature of this process, we did not and still do not anticipate any issues with the Petition being granted after being reviewed by the court staff and presented to the judge. No issues have been brought to our attention that require any additional filings.

However, the Surrogate's Courts in New York City continue to be caught up in a severe backlog. As noted in our prior Status Report, the probate counsel, Judah Schwartz was closing his practice. Consequently, on July 23, 2024, the undersigned filed a Consent to Change Attorney to substitute our firm for that of Mr. Schwartz. On August 15, 2024, the Surrogate's Court added our firm as counsel for the Estate. Even more than previously, our office will be able to notify this Court as soon as the Lift Restrictions Petition is granted as notices will now go directly to our firm. Unfortunately we still have not received a ruling on our underlying Lift Restrictions Petition.

Accordingly, Plaintiff requests a deadline for another status report be set out for December 9, 2024.

Respectfully,

/s/

Ahmad Keshavarz

cc: all counsel (via ECF)